

DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP
2101 L Street NW • Washington, DC 20037-1526
Tel (202) 785-9700 • Fax (202) 887-0689

Writer's Direct Dial: (202) 955-6680
E-Mail Address: HubbardA@dsmo.com

May 30, 2002

NOTICE OF EX PARTE PRESENTATION

Marlene H. Dortch
Secretary
Federal Communications Commission
Portals II
445 12th Street, S.W.
Washington, D.C. 20554

Re: Federal-State Joint Board on Universal Service Proceedings on Lifeline Service
and the Definition of Universal Service (CC Docket No. 96-45)

Dear Ms. Dortch:

On behalf of the American Public Communications Council, enclosed is a copy of a letter and an accompanying case study to Commissioner Thomas Dunleavy in his capacity as a member of the Federal-State Joint Board on Universal Service. The materials relate to the need for universal service support for payphones.

Sincerely,

/s/

Allan C. Hubbard

ACH/clh

Enclosure

Copy to:

Commissioner Dunleavy, Joint Board Member
Carl Johnson, Joint Board Staff

DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP

2101 L Street NW • Washington, DC 20037-1526

Tel (202) 785-9700 • Fax (202) 887-0689

Writer's Direct Dial: (202) 955-6680

E-Mail Address: HubbardA@dsmo.com

May 29, 2002

The Honorable Thomas J. Dunleavy
Commissioner
New York Public Service Commission
One Penn Plaza, 8th Floor
New York, NY 10119

**Re: Federal-State Joint Board on Universal Service Proceedings on Lifeline Service
and the Definition of Universal Service (CC Docket No. 96-45)**

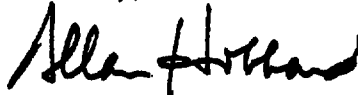
Dear Commissioner Dunleavy:

As follow-up to yesterday's teleconference on the need for universal service support for payphones, we are sending you the enclosed copy of "The Importance of Payphones In Providing Access to Social Services: A Case Study In Chicago." The data in the study shows that the fourth most frequently called 800 number from the payphones studied was the Illinois "Link" Help Desk, which furnishes information about food stamps, income assistance and related services.

Also, in response to Mr. Johnson's question regarding what constitutes widespread deployment of payphones, we point to the Federal Communications Commission's 1999 payphone order on dial-around compensation in which the Commission found that the existing level of deployment was consistent with Congress's goal of widespread deployment. *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, Third Report and Order, 14 FCC Rcd 2545, ¶ 141 ("current deployment of payphones . . . is consistent with Congress's goal of widespread deployment of payphones"). Elsewhere in the order, the Commission noted that at that time, there were 2.15 million payphones. *Id.* n.390.

We appreciated the opportunity to discuss with you and Mr. Johnson the need for universal service support for payphones. Please let us know if you have any questions on this matter.

Sincerely,



Allan C. Hubbard

Enclosure

Copy to (w/encl.):

Carl Johnson, Joint Board Staff

1177 Avenue of the Americas • 41st Floor • New York, New York 10036-2714

Tel (212) 835-1400 • Fax (212) 997-9880

www.legalinnovators.com



American Public Communications Council, Inc.

**THE IMPORTANCE OF PAYPHONES
IN PROVIDING ACCESS TO SOCIAL SERVICES:
A CASE STUDY IN CHICAGO**

INTRODUCTION

Payphones play a critical role in providing access to social services to low income households. About 94.1% of all American households have a telephone. Yet, there remain significant segments of the populations that do not have easy access to basic telephone service. For example, approximately 17% of black households with incomes under \$10,000 and about 10% of Hispanic households with incomes under \$10,000 do not have telephones in their home. Roughly 23% of rural poor households and 28% of poor Native American, Eskimo and Aleut households do not have telephones. Moreover, these same groups have lower rates of wireless telephone use. Consequently, these groups tend to rely on payphones to obtain access to social services, such as state assistance programs and local health services.

PAYPHONE USE IN THE CHICAGO AREA

National data on payphone use for social service calls are not readily available, but some data for certain metropolitan areas are available. The table below shows frequently called "800" numbers originating from telephones of a major independent pay telephone company in the Chicago area. The company has approximately 1400 payphones distributed widely throughout the Chicago metropolitan area. While this is a significant network, it represents less than 2% of payphones in Illinois.

The table shows that a large number of "800" calls to social service agencies are made from pay telephones. In fact, the fourth most frequently called "800" number was the Illinois "Link" Help-Desk, which furnishes information about food stamps, income assistance and related services. More than 47,000 "800" calls were made to this number. The table also shows other frequently called "800" numbers to social service agencies.

The table confirms that payphones perform an important role in providing access to these agencies. Moreover, calls to "800" numbers represent only a portion of calls made at pay telephones. (For this network during the relevant time period, "800" calls represented about 39% of total calls.) Thousands of other calls are made to social service agencies by placing coins in the payphone.

**"800" Social Service Calls from one Chicago Area Payphone Network
July 1999 to June 2000**

<u>Party Called</u>	<u>Purpose</u>	<u>Number of "800" Calls</u>
Illinois "Link" Help Desk	Food Stamps, Income Assistance, etc.	47,342
Illinois Dept. of Human Services	Social Services	3,537
Social Security	Information on Social Security Program	3,051
Illinois Dept. of Corrections	Weekly Check-Ins, etc.	1,908
Cook County Inmate Information Center	Information	829
CTA Para-Transit Operation	Disabled Services, Bus Schedules	574
Illinois Dept. of Human Services	Social Services	514
Bureau of child Support Help Line	Cook County Inquiries	479
Illinois Dept. of Public Aid, Child Support Enforcement Help Line	Obtaining Support Payments in Springfield Region	304
Illinois Dept. of Human Services	Illinois Relay Service	285
Illinois Dept. of Revenue	Taxpayer Assistance	259
Veterans Benefits	Information and Claims Assistance	229
DCFS-Dept. of Children & Family Services	Information	144
Illinois Dept. of Public Aid, Bureau of Kid Care	Information	106
Homeless Hotline	Assistance with Shelter	101
Illinois Dept. of Health & Human Services	Hotline	74
Illinois Dept. of Human Services	Illinois Relay Service	58
Illinois Dept. of Public Health	Central Complaint Registry	57
AIDS Hotline	Information	39
Drug Hotlines	Information	37
Social Security Administration of Illinois	Information	30
Illinois Poison Control Center	Emergency Information	14
Illinois Dept. of Public Aid, Child Support Enforcement Help Line	Obtaining Support Payments in Marion Region	14
Illinois Dept. of Public Health	WIC Help Line (Women, Infants, & Children Nutrition)	12
HIV /AIDS / Testing – Confidential	Information	12
Illinois Dept. of Health & Human Services	Domestic Violence Hotline	11